

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

VIVIAN GERAGHTY,

Plaintiff,

v.

**JACKSON LOCAL SCHOOL DISTRICT
BOARD OF EDUCATION, et al.,**

Defendants.

Case No. 5:22-cv-02237-PAB

Judge Pamela A. Barker

Oral Argument Requested

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff Vivian Geraghty hereby moves for summary judgment as to Defendants' liability on all of the causes of action raised in her Verified Complaint for constructively discharging her in retaliation for her exercise of constitutional rights. (See Doc. 1 ¶¶ 127–192.) A supporting memorandum of law is attached.

Respectfully submitted this 14th day of February, 2024.

s/ P. Logan Spena

P. Logan Spena*
Tyson C. Langhofer*
Mathew W. Hoffmann*
Alliance Defending Freedom
44180 Riverside Parkway
Lansdowne, Virginia 20176
Telephone: (571) 707-4655
Facsimile: (571) 707-4790
lspena@ADFlegal.org
tlangofer@ADFlegal.org
mhoffman@ADFlegal.org

David A. Cortman*
Alliance Defending Freedom
1000 Hurricane Shoals Road NE, Suite D-1100
Lawrenceville, Georgia 30043
Telephone: (770) 339-0774
Facsimile: (770) 339-6744
dcortman@ADFlegal.org

Matthew J. Burkhart
Gallagher Kavinsky & Burkhart LPA
8740 Orion Place, Suite 200
Columbus, Ohio 43240-4063
Telephone: (614) 885-9022
Facsimile: (614) 885-9024
mjb@gkb-law.com
Ohio State Bar Number 0068299

Counsel for Plaintiff Vivian Geraghty
**Admitted pro hac vice*